



number ten tantalum place muskogee, oklahoma 74401 (918) 687-6303

July 16, 1992

OH D- 007221831

Mr. Harvey Spiro
Environmental Engineer
Low Level Waste Division
U.S. Nuclear Regulatory Commission
Mail Stop 5E4
Washington, DC 20555

Transmittal
Revised Remedial Assessment Work Plan
and
Request for License Amendment
Fansteel Metals
Muskogee, Oklahoma

Dear Mr. Spiro:

In accordance with our May 27, 1992 meeting at your offices and your recent letter (Docket No. 40-07580) which we received on July 13, 1992, Fansteel Metals (Fansteel) is submitting the final revision of the Remedial Assessment Work Plan for our Muskogee, Oklahoma facility. The technical comments of the Nuclear Regulatory Commission (NRC) have been addressed in this final revision as discussed with you and your staff. The revisions are identified by bold vertical lines in the left-hand margin of the revised pages of the enclosed work plan. The technical comments of the NRC and Fansteel's associated responses consist of the following:

Comment 1 The scope of work for the remedial assessment should include the entire Fansteel facility, specifically the characterization of materials contained in all facility ponds.

Response: Fansteel has revised the Remedial Assessment Work Plan to include the sampling of pond contents and the analysis of the pond content samples consistent with the list of parameters provided by the NRC.

Comment 2 The Remedial Assessment Work Plan should be a stand-alone document. Remove all references to the Decommissioning Plan.

Response: All references to the Decommissioning Plan have been removed from the Remedial Assessment Work Plan.



195831

Comment 3 In accordance with current NRC guidance, 30 off-site sampling locations should be screened to determine background radioactivity.

Response: The Remedial Assessment Work Plan has been revised to reflect the sampling of 30 off-site locations for the determination of background radioactivity.


Comment 4 Air sampling locations should be chosen with respect to prevailing wind directions in conjunction with site-specific meteorological data to ensure appropriate characterization of both upwind and downwind air quality.

Response: Although this was always the intent of Fansteel, the Remedial Assessment Work Plan has been revised to more clearly state the criteria for the selection of air monitoring locations.

Fansteel understands that by the incorporation of these comments into the Remedial Assessment Work Plan, NRC has granted their approval of the plan and has no reservations regarding the implementation of the remedial assessment work scope. As such, and in accordance with NRC guidance, Fansteel requests that our NRC License No. SMB-911 be amended to include the final approved Remedial Assessment Work Plan. Included herein, as part of Fansteel's request for license amendment, is a schedule of the anticipated duration of the remedial assessment and currently proposed decommissioning process. The schedule for implementation of the remedial assessment through the submission of the specific Decommissioning Plan is fairly firm. However, this schedule is dependent upon NRC issuing the amended license to Fansteel by September 1, 1992. The schedule provided for decommissioning is an estimate based on current information. A more detailed schedule for decommissioning in addition to a financial assurance plan will be submitted to the NRC at the completion of the remedial assessment work scope.

With regard to Items 6, 7, 8, and 9 of your recent letter (Docket No. 40-07580), Fansteel is compiling information to address the NRC's concerns associated with third-party processing of wastes (Item 6). We welcome the opportunity to meet with the NRC during site characterization activities to discuss and review the progress of the work (Item 7). A formal schedule for these meetings can be developed in the near future. Should Fansteel determine that mixed wastes are present on site, the NRC and the U.S. Environmental Protection Agency will be properly notified (Item 8). Fansteel agrees that remediation/decommissioning alternatives (Item 9) are not issues which are pertinent to the site characterization. Remediation/decommissioning alternatives will be discussed in Fansteel's future Decommissioning Plan.

As stated by the NRC during the May 27, 1992 meeting, Fansteel anticipates hearing from you expeditiously regarding the amendment to our current license and we look forward to the commencement of the remedial assessment. Per our discussions, we have assumed that Fansteel will receive the amended license by September 1, 1992. As stated previously, the enclosed schedule is based on this assumption. In the interim should you have any questions



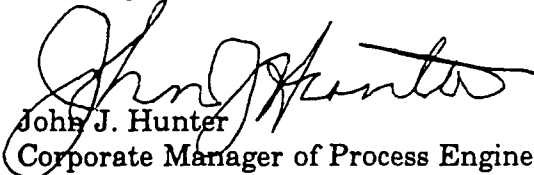
Mr. Harvey Spiro

3

July 16, 1992

regarding the information contained within this letter or the enclosed work plans, please contact me or Fansteel's consultant, Earth Sciences Consultants, Inc. (Mr. Joseph M. Harrick, [412] 787-3200).

Sincerely,


John J. Hunter
Corporate Manager of Process Engineering
and Facilities Construction

JJH:klb

Enclosures

cc: D. Dillon
D. Dimich
L. Kirk
T. Lyhane
E. Sierra